

Richard G. McCracken, SBN 2748  
McCRACKEN, STEMERMAN & HOLSBERRY  
1630 S. Commerce Street  
Las Vegas, NV 89102  
Telephone: (702) 386-5107  
FAX: (702) 386-9848  
E-Mail: [rmccracken@dcbsf.com](mailto:rmccracken@dcbsf.com)

- and -

Anton Hajjar (Pro Hac Vice pending)  
O'DONNELL, SCHWARTZ & ANDERSON, P.C.  
1300 L Street, N.W., Suite 1200  
Washington, DC 20005  
Telephone: (202) 898-1707  
FAX: (202) 682-9276  
E-Mail: [ahajjar@odsalaw.com](mailto:ahajjar@odsalaw.com)

Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ROSEMARY GARITY,

Plaintiff

vs.

APWU-AFL-CIO, APWU LOCAL #7156

Defendant.

CASE No. 2:11-cv-01109-PMP-GWF

UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO ANSWER OR PLEAD [FIRST  
REQUEST]; PROPOSED ORDER

1 Defendant APWU-AFL-CIO requests an extension of time to and including August 8,  
2 2011, to file a responsive pleading in accordance with Rule 12, F.R. Civ. P. This is Defendant's  
3 first request for an extension of time to respond to the complaint. This motion is based on the  
4 defendant's need to investigate the factual allegations in the complaint and determine whether there  
5 are defenses to the complaint. The plaintiff authorizes the defendant to state that she has no  
6 objection to the granting of the extension requested in this motion. A proposed order is annexed.  
7

8 DATE: July 21, 2011


9 Richard G. McCracken, SBN 2748  
10 McCRACKEN, STEMERMAN & HOLSBERRY

11 - and -

12 Anton Hajjar (Pro Hac Vice pending)  
13 O'DONNELL, SCHWARTZ & ANDERSON, P.C.

14  
15 By: /s/ Richard G. McCracken  
16 Attorneys for Defendant

17  
18 IT IS SO ORDERED:

19  
20  
21   
22 GEORGE FOLEY, JR.  
23 United States Magistrate Judge

24  
25  
26  
27  
28 DATED: July 22, 2011

CERTIFICATE OF SERVICE

The undersigned certifies that on July 21, 2011, I served the foregoing document described as UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR PLEAD [FIRST REQUEST]; PROPOSED ORDER in this action by sending via first class, postage paid, a true copy thereof, to:

Rosemary Garity  
3232 N. Florenza Street  
Pahrump, NV 89060

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: July 21, 2011

/s/ Deborah Trujillo  
Deborah Trujillo, PLS